

Joel E. Tasca
Nevada Bar No. 14124
Andrew S. Clark
Nevada Bar No. 14854
BALLARD SPAHR LLP
1980 Festival Plaza Drive, Suite 900
Las Vegas, Nevada 89135
Telephone: (702) 471-7000
Facsimile: (702) 471-7070
E-mail: tasca@ballardspahr.com
E-mail: clarkas@ballardspahr.com

*Attorneys for Defendant Specialized
Loan Servicing*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ELIZABETH ESTRADA,

Plaintiff,

v.

SPECIALIZED LOAN SERVICING,
LLC; DOES I through X and ROE
BUSINESS ENTITIES I through X,
inclusive,

Defendants.

CASE NO. 2:22-cv-001620-GMN-NJK

**STIPULATION AND ORDER TO
EXTEND TIME FOR DEFENDANT TO
RESPOND TO PLAINTIFF'S
COMPLAINT AND MOTION FOR
PRELIMINARY INJUNCTION**

(First Request)

Specialized Loan Servicing LLC's ("SLS") response to Plaintiff Elizabeth Estrada's ("Plaintiff") Complaint is currently due October 27, 2022, and its response to Plaintiff's Motion for Preliminary Injunction (ECF No. 4) was due October 18, 2022. SLS and Plaintiff agree that SLS has up to and including November 11, 2022, to respond to Plaintiff's complaint and Motion for Preliminary Injunction. SLS, its agents, assigns and principals further agree SLS will not continue with foreclosure proceedings, including, but not limited to recording a notice of sale against the Property until such time as the court decides Plaintiff's motion for preliminary injunction.

Extension of the deadline to respond to Plaintiff's Motion for Preliminary Injunction is warranted under LR IA 6-1 because counsel for SLS was recently retained

1 to defend Plaintiff's claims. Upon being retained, counsel immediately contacted
 2 Plaintiff's counsel to work to reach a stipulation that will moot the need for a
 3 preliminary injunction.

4 The requested extension will provide the parties time to reach a stipulation to
 5 moot Plaintiff's motion for preliminary injunction and allow the parties to investigate
 6 Plaintiff's allegations and discuss potential resolution and, if needed, for SLS to
 7 prepare a response.

8 This is the first request for an extension, and it is made in good faith and not for
 9 purposes of delay.

10 DATED this 26th day of October, 2022.

11 BALLARD SPAHR LLP

HANKS LAW GROUP

12 By: /s/ Andrew Clark

By: /s/ Karen Hanks

13 Joel E. Tasca

Karen Hanks

14 Nevada Bar No. 14124

Nevada Bar No. 9578

15 Andrew S. Clark

7625 Dean Martin Drive, Suite 110

16 Nevada Bar No. 14854

Las Vegas, Nevada 89139

17 1980 Festival Plaza Drive, Suite 900

(702) 758-8434

18 Las Vegas, Nevada 89135

karen@hankslg.com

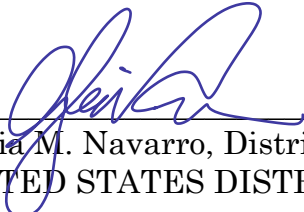
19 *Attorneys for Defendant Specialized*
 20 *Loan Servicing, LLC*

Attorneys for Plaintiff

21 **ORDER**

22 **IT IS SO ORDERED.**

23 Dated this 26 day of October, 2022.

24
 25
 26 
 27 Gloria M. Navarro, District Judge
 28 UNITED STATES DISTRICT COURT

BALLARD SPAHR LLP
1980 FESTIVAL PLAZA DRIVE, SUITE 900
LAS VEGAS, NEVADA 89135
(702) 471-7000 FAX (702) 471-7070

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28